WANG HECKER LLP

By ECF

December 30, 2024

The Honorable Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

      Re: *Graves v. Combs et al.*, No 24 Civ. 07201 (SDNY) (AT)
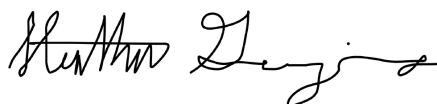
Dear Judge Torres:

      This firm, along with Allred Maroko & Goldberg, represents Plaintiff Thalia Graves ("Plaintiff"). We write to request that the Court grant Plaintiff leave voluntarily to dismiss the eight corporate Defendants in this action (Daddy's House Recordings, Inc., CE OpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, Bad Boy Records LLC, and Bad Boy Productions LLC) (collectively the "Corporate Defendants"), and to file an amended complaint reflecting their dismissal. Plaintiff has made the decision to dismiss these parties in light of new factual information and recent developments in the case law. The remaining defendants, Defendants Sean Combs and Joseph Sherman, both consent to the dismissal of the Corporate Defendants.

      The Civil Case Management Plan and Scheduling Order, which the Court so-ordered on December 16, 2024 (ECF Doc. No. 41), specifies that amended pleadings may not be filed except with leave of the Court and that any motion to amend must be filed by January 15, 2025. *Id.* In light of the fact that all remaining Defendants consent, we respectfully request that the Court grant Plaintiff leave to file a stipulation of voluntary dismissal and Amended Complaint reflecting the dismissal of the Corporate Defendants.

Respectfully yours,

Heather Gregorio
WANG HECKER LLP
305 Broadway, Suite 607
New York, New York 10007
(212) 620-2600
hgregorio@wanghecker.com

cc: All parties by ECF

GRANTED. Plaintiff shall file her amended complaint by **January 17, 2025.**

SO ORDERED.

Dated: January 3, 2025
            New York, New York

_____
ANALISA TORRES
United States District Judge